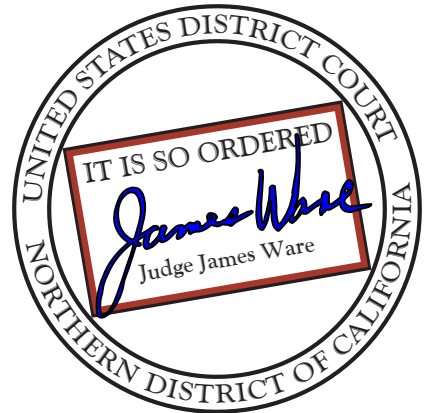


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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION

12
13 IN RE JUNIPER DERIVATIVE ACTIONS

No. 5:06-cv-03396-JW

14
15 **STIPULATION AND [PROPOSED]**
ORDER RE TEMPORARY STAY

16 This Document Relates To:

17 ALL ACTIONS
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Date: N/A
Time: N/A
Before: Hon. James Ware

1 This Stipulation is entered into by and among Lead Plaintiffs the Indiana State District
2 Council of Laborers and HOD Carriers Pension Fund, Employer-Teamsters Local Nos. 175 & 505
3 Pension Trust Fund, and Timothy Hill, and defendants Juniper Networks, Inc., Scott Kriens,
4 Stratton Sclavos, William Stensrud, Robert M. Calderoni, Kenneth A. Goldman, William R.
5 Hearst III, Kenneth Levy, Frank J. Marshall, Vinod Khosla, Pradeep Sindhu, Robert Dykes,
6 Marcel L. Gani, Peter L. Wexler, Ashok Krishnamurthi, and Lloyd Carney (the "Defendants"), by
7 and through their respective attorneys of record.

8 WHEREAS, pursuant to the Stipulation and Order Regarding Briefing Schedule dated
9 May 22, 2007, the parties agreed:

10 1. Defendants shall file and serve their response(s) to the Verified Consolidated
11 Shareholders Derivative Complaint on or before June 15, 2007; and

12 2. Plaintiffs shall file and serve their opposition within 45 days after service of
13 Defendants' response(s); and

14 3. Defendants shall file and serve their reply 21 days after service of the opposition;

15 WHEREAS, through their respective counsel, the above-named Defendants and Plaintiffs
16 have agreed to pursue settlement discussions and/or mediation;

17 WHEREAS, the Defendants and Plaintiffs believe that it would conserve the resources of
18 the Court and the parties if motion practice and proceedings are temporarily stayed to allow the
19 parties time to conduct settlement discussions and/or mediation;

20 NOW, THEREFORE, Defendants and Plaintiffs, by and through their respective counsel,
21 hereby stipulate and agree to, and ask the Court to approve, the following:

22 1. The current deadlines and briefing schedule for Defendants' response(s) to the
23 Verified Consolidated Shareholders Derivative Complaint shall be vacated;

24 2. This case will be temporarily stayed to allow the parties time to conduct
25 settlement discussions and/or mediation; and

26 3. In August 2007, the parties shall meet and confer, and confer with the Court, to
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28 ///

1 set a further Case Management Conference at which to revisit the status of the case.

2 IT IS SO STIPULATED.

3 DATED: June 8, 2007

WILSON SONSINI GOODRICH & ROSATI, P.C.
NINA F. LOCKER
STEVEN GUGGENHEIM
JONI OSTLER

4
5 /s/ Joni Ostler

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10 Attorneys for Defendants

11 DATED: June 8, 2007

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13 /s/ Travis E. Downs III

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20 DATED: June 8, 2007

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21 /s/ Robin Winchester

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28 ORDER PURSUANT TO STIPULATION

The above entitled case is stayed until September 10, 2007. All deadlines are hearing are VACATES. The parties shall appear for a Status Conference on September 10, 2007. The parties shall meet and confer and file a joint status statement ten (10) days before the date of the conference.

Date: June 12, 2007


JAMES WARE

United States District Judge

I, Joni Ostler, am the ECF user whose identification and password are being used to file the STIPULATION AND [PROPOSED] ORDER RE TEMPORARY STAY. In compliance with General Order 45.X.B, I hereby attest that both Travis Downs III and Robin Winchester have concurred in this filing.

Dated: June 8, 2007

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Joni Ostler
Joni Ostler

CERTIFICATE OF SERVICE VIA EMAIL

I, Joni Ostler, declare:

I am employed in Santa Clara County. I am over the age of 18 years and not a party to the within action. My business address is Wilson Sonsini Goodrich & Rosati, 650 Page Mill Road, Palo Alto, California 94304-1050.

I am readily familiar with Wilson Sonsini Goodrich & Rosati's practice for collection and processing of documents for transmittal via e-mail.

Pursuant to the Order Following Case Management Conference entered by the Court on October 20, 2006, I served the foregoing STIPULATION AND [PROPOSED] ORDER RE TEMPORARY STAY on lead counsel for the appointed lead plaintiffs, and counsel for defendant Ernst & Young, in the related action *In re Juniper Networks, Inc. Securities Litigation*, No. C06-04327-JW, as listed below, via email as attachments by following ordinary business practices at Wilson Sonsini Goodrich & Rosati:

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22 *Counsel for Defendant Ernst & Young*

23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct. Executed at Palo Alto, California on June 8, 2007.

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/s/ Joni Ostler
Joni Ostler